

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF INDIANA
INDIANAPOLIS DIVISION

JUDICIAL WATCH, INC.,
and TRUE THE VOTE,

Plaintiffs,

v.

J. BRADLEY KING, *et al.*

Defendants.

Case No. 1:12-cv-800-WTL-TAB

**PLAINTIFF JUDICIAL WATCH'S RESPONSES AND OBJECTIONS TO
DEFENDANTS' FIRST REQUEST FOR PRODUCTION OF DOCUMENTS**

Plaintiff Judicial Watch, by counsel and pursuant to Rules 26 and 34 of the Federal Rules of Civil Procedure, hereby responds to Defendants' First Request for Production of Documents as follows:

GENERAL OBJECTIONS

The following objections are incorporated into each specific response given below:

1. Plaintiff objects generally to Defendants' request to the extent that they are overbroad, unduly burdensome, or seek documents that are neither relevant to any party's claims or defenses nor reasonably calculated to lead to the discovery of admissible evidence.
2. Plaintiff objects to each request to the extent that such request seeks to impose any greater obligation than otherwise provided under the rules of discovery set forth in the Federal Rules of Civil Procedure or any other applicable law.
3. Plaintiff objects generally to the Defendants' requests to the extent that they seek documents that are protected by the attorney-client privilege, the work-product doctrine, or are otherwise protected or immune from discovery.

EXHIBIT

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RESPONSE: Plaintiff objects to the extent this request seeks information protected from disclosure under the First Amendment privilege. Plaintiff hereby incorporates its response to Request No. 2 above. Subject to and notwithstanding these objections or each general objection first listed above, Plaintiff shall produce documents responsive to this request.

REQUEST NO. 10: Documents sufficient to identify by name, address and telephone number all the alleged members of Judicial Watch that are citizens of the State of Indiana as alleged in Paragraphs 25 and 26 of the Complaint.

RESPONSE: Objection. This request seeks information protected from disclosure under the First Amendment privilege.

REQUEST NO. 11: All documents relating to any communications between Judicial Watch and its Indiana members regarding the integrity of Indiana's elections and/or the integrity of voter registration rolls.

RESPONSE: Plaintiff objects to the extent this request seeks information protected from disclosure under the First Amendment privilege. Plaintiff further objects to the extent this request seeks documents subject to the attorney-client privilege or the work-product doctrine. Plaintiff hereby incorporates its response to Request No. 2 above. Subject to and notwithstanding these objections or each general objection first listed above, Plaintiff shall produce documents responsive to this request.

REQUEST NO. 12: All documents identifying any individuals or entities that have provided financial support for Plaintiffs' Lawsuit.